

**THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
ANDERSON DIVISION  
C/A No. 8:16-CV-01957-BHH**

John Doe,

Plaintiff,

vs.

Clemson University, Clemson University Board of Trustees, James P. Clements, individually and as agent for Clemson University, Almeda Jacks, individually and as agent of Clemson University, Alesia Smith, individually and as agent of Clemson University, Suzanne Price, individually and as agent of Clemson University, Loreto Jackson, individually and as agent of Clemson University, David Frock, individually and as agent of Clemson University,

Defendants.

**SUPPLEMENTAL AFFIDAVIT OF  
CRYSTAL ANDERSON**

**PERSONALLY APPEARED BEFORE ME**, the undersigned, who after being duly sworn, deposes and says:

1. My name is Chrystal Anderson. I am over the age of eighteen (18) years and provide this Affidavit of my own personal knowledge.
2. I received a copy of the Court's Order dated January 23, 2018 and filed as Entry Number 71 in this lawsuit.
3. I am not in possession of any communications between myself and Jane Doe or Charles Doe, individually or together, whether made during my employment with Clemson University or after my employment ended, that do not relate to Jane Doe's therapy. The pseudonyms "Jane Doe" and "Charles Doe" refer to the male and female, respectively, identified in the May 2017 subpoena, which is filed as Entry Number 51-1 in this lawsuit.

[Signature Page to Follow]

Chrystal Anderson, LPC  
Chrystal Anderson, LPC

SWORN to and subscribed before me  
this 9 day of February, 2018

Chrystal Anderson (L.S.)

Notary Public for South Carolina

My Commission Expires: 2/7/2023

